

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**DEUTSCHE BANK NATIONAL TRUST §
COMPANY, AS TRUSTEE FOR §
AMERIQUEST MORTGAGE SECURITIES §
INC., ASSET-BACKED PASS-THROUGH §
CERTIFICATES, SERIES 2004-R10, §**

Plaintiff,

v.

**SAIHAT CORPORATION AND §
FAIRMONT PARK EAST §
HOMEOWNERS' ASSOCIATION, §**

Defendants.

Civil Action No. 4:19-cv-00825

PLAINTIFF'S STATUS REPORT

Plaintiff Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2004-R10 ("Plaintiff") file this Status Report as ordered by the Court (Minute Entry on July 22, 2020) and respectfully show the Court as follows:

On March 20, 2020, the Court entered an Order requiring Plaintiff and Defendant Saihat Corporation ("the Parties") to discuss and negotiate in good faith the potential for settlement. (ECF Document No. 45.) The Court further noted that the Parties must conduct negotiations by April 10, 2020 and submit a joint report on the same. (*Id.*). The Parties submitted a Joint Status Report on April 10, 2020, informing the Court that they have started engaging in settlement negotiations. (ECF Document No. 46.) The Court reviewed the said report and ordered the Parties to provide another update by May 15, 2020. (Minute Entry on May 15, 2020.) On May 15, 2020, the Parties filed a Joint Status Report notifying the Court that they intend to mediate

this dispute. (ECF Document No. 47.) In response, the Court ordered the Parties to conduct mediation by June 19, 2020. (Minute Entry entered on May 21, 2020.)

The Parties conducted a virtual mediation on June 3, 2020. However, the mediation was adjourned until Defendant could provide documentation for Plaintiff's review to determine if settlement was possible. (*See* ECF Document No. 48.) Therefore, Plaintiff requested a brief extension of the mediation deadline. (*Id.*). The Court granted an extension and ordered the Parties to finish mediation by July 10, 2020. (ECF Document No. 49.) Subsequent to the extension, Plaintiff's counsel did not receive any communication from Defendant's counsel until on July 12, 2020, when Defendant filed a Supplemental Response to Plaintiff's Motion for Summary Judgment. (ECF Document No. 50.)

Therefore, the Parties reached an impasse and the dispute between the Parties remains unresolved.

Respectfully submitted,

By: /s/ Samin Hessami

MARK D. CRONENWETT

Texas Bar No. 00787303

mcronenwett@mwzmlaw.com

SAMIN HESSAMI

Texas Bar No. 24100109

shessami@mwzmlaw.com

MACKIE WOLF ZIENTZ & MANN, P.C.

14160 N. Dallas Parkway, Suite 900

Dallas, Texas 75254

214-635-2650 (Phone)

214-635-2686 (Fax)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2020, a true and correct copy of the foregoing was served via e-service on the following counsel of record:

Jerry L. Schutza
815 Walker Street, Suite 1453
Houston, Texas 77002

/s/ Samin Hessami
SAMIN HESSAMI